IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT AKRON

IN RE:	) CASE NO. 08-53983
	)
KIMBERLY A. VALENTI	) IN PROCEEDINGS UNDER CHAPTER 7
	)
	) JUDGE MARILYN SHEA-STONUM
	)
	) OBJECTION OF ROBERT S. THOMAS,
	) TRUSTEE, TO MOTION FOR RELIEF
	) FROM STAY AND ABANDONMENT

Now comes Robert S. Thomas, II, Trustee, by and through his attorney, and, for his objection to the motion for relief from stay and abandonment filed by First Mortgage Strategy Groups, Inc., states as follows:

1. Admits the allegations contained in paragraph 1.

2. Denies, for want of knowledge, the allegations contained in paragraphs 2, 3, 4, 5, 6, 7, 8, 9, 10, and 11, except that he admits all matters of public record.

3. States that the value of the property exceeds the amount of the indebtedness secured or allegedly secured by liens upon said property and, accordingly, the debtor has an equity in said property.

4. States affirmatively, on information and belief, that the lien, claim, or other encumbrance of First Mortgage Strategy Groups, Inc. may have been improperly executed and subject to avoidance and that the trustee needs additional time to more fully evaluate the validity of said alleged lien.

GIBSON & LOWRY

/s/ Michael J. Moran
_____
Michael J. Moran   (#0018869)
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CERTIFICATE OF SERVICE

A copy of this objection was filed electronically and served via the court's electronic docketing system on June 17, 2009 upon the following:

Nicole M. Hitch, nhitch@brouse.com

Donald P. Mitchell, bankruptcyfiles@wmconnect.com

Stacey A. O'Stafy, bankruptcy@mdk-llc.com

Keith Rucinski, efilings@ch13akron.com

Robert S. Thomas, II, rsttrustee@yahoo.com

United States Trustee

A copy of this objection was sent by regular U.S. mail on June 17, 2009 to the following:

Kimberly A. Valenti
5977 Ogilby Drive
Hudson, OH 44236

/s/ Michael J. Moran
Michael J. Moran
Attorney for Trustee